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Are you up to speed with Type Approval?



Katherine Narici of the Heavy Transport Association reviews the ongoing implementation of Type Approval Directive EC 2007/46 and other legislation and its subsequent affects for the heavy haulage industry.

Until now, specially built heavy tractors, which are operating as dedicated STGO vehicles, not being plated or tested, have been exempt from the Type Approval Directive EC 2007/46, and Heavy Transport Association members have for many years enjoyed the benefits of this exemption. However, the date when that exemption will be lost is nearing. In fact, from October 29 2014 all vehicles, where weights or dimensions exceed those specified for general use in EC 95/53 and EC 97/27, will have to be fully type approved.

The European Community Whole Vehicle Type Approval (ECWVTA) has been implemented into UK policy to ensure that all manufactured vehicles meet the required standards for safety and environmental regulations. Vehicle

design now has to be 'type approved' before sale, registration and entry into service across all EU member states so that all countries accept each others Type Approvals and there is no need for further testing in each country.

The regulations became part of UK law from April 2009 and since then have been phased in and this will continue until 2014. Legislation was first extended to cover all new road vehicles such as buses, coaches, trucks, trailers (and caravans) and certain special purpose vehicles such as wheelchair accessible vehicles. Since October 2012 ECWTA also applies to existing type medium and heavy commercial vehicles and trailers built in a single stage, as well as new type medium and heavy commercial vehicles built in multi-stages. It will apply to existing type medium and heavy commercial vehicles built in multi-stages from October 29 2014.

Because of the very nature of special purpose vehicles, there are additional complications in gaining approval because of having to carry out extensive systems testing – braking being one of the most obvious – and this adds cost. Manufacturers, converters and bodybuilders of Special Types Vehicles have to seek Type Approval in order to register vehicles across Europe. Once the relevant application date passes it will not be possible to sell or register any new vehicles covered by the Directive without them having an approval certificate.

The business sectors which have been particularly affected by ECWVTA are body builders ie. those that take a chassis and build or modify a body of any description on it before selling it to the customer, and manufacturers of commercial vehicles imported from inside or outside Europe.

They will need to have a quality management system in place such as ISO 9000, together with Vehicle Certification Authority (VCA) Conformity of Production (COP) authorisation, the implementation and management of which can be quite onerous. Only then can the bodybuilder or converter issue the all-important Certificate of Conformity (COC), which is essential for vehicle registration.

The fall back plan is to submit the completed vehicles for Individual Vehicle Approval (IVA) but even this requires evidence that most of the vehicle systems, specifically including braking, have been tested to confirm that they meet the European Directive performance requirements.

The one advantage of IVA is that the manufacturer does not need to have an established quality system in place because each and every vehicle is individually inspected by the Vehicle & Operator Services Agency (VOSA).

Manufacturers of current heavy haulage tractors and trailers will need to invest heavily to meet the new stricter requirements under ECWVTA. In some cases this may not be technically possible or economically feasible based on the relatively small volumes being built.

There is also the possibility that maximum permitted axle weights may have to be reduced in order to meet the new requirements (brakes and steering limited) and this is something that will cause major problems in the heavy haulage industry. For abnormal load vehicles with modular construction there could be conflicts as numbers of axles and steering axle configurations change during operations.

One of the problems is that manufacturers may have to make significant changes in product design or



Typical Volvo FH16 8 x 4 tractor Photographs courtesy of Volvo Group UK



Vehicle design now has to be 'type-approved' before sale, registration and entry into service

manufacturing process. For example, the extended front chassis for push/pull operations are not usually covered by the base vehicle approvals. Gaining ECWVTA approval for small volume modifications such as this is complicated, time consuming and costly. The simpler solution here is to put them through the



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IVA route where there is an exemption clause, although they would still require a covering bumper to meet the Exterior Projections requirements.

The fitting of additional axles will invalidate a number of base vehicle approvals so they would need to be tested and approved again. These would include, at the very least, brake systems, steering systems, masses and dimensions.

The unladen weight of an 8 x 4 chassis when fitted with large rear cab mounted cranes cannot usually be built within the UK legal gross vehicle weight limit of 26 tonnes for a tractor. This means that under the current rules, it will not be possible to type approve or register a new vehicle of this type for use on the road after October 29 2014.

From a manufacturer, bodybuilder or converter's point of view, obtaining the full ECWVTA will be an extremely costly procedure, and in many cases it will be difficult to justify the expenses when there are only small numbers of vehicles being produced.

Volvo Group UK, members of the Heavy Transport Association, are carrying out investigations into the various options available and are confident that they will be able to offer type approved solutions to meet the majority of their customer's requirements before the October 2014 deadline.

Another proposal currently before the European Commission regards periodic roadworthiness tests for vehicles. This

roadworthiness test proposal will result in HGVs currently exempt from plating and testing being subjected to some form of annual test. How does this affect the abnormal loads sector? If the proposals are carried out then all 'HGV-based' vehicles currently excluded from the need for an annual test will be required to have some form of roadworthiness test or inspection. The same applies to motor tractors, heavy and light locomotives. The intention is to ensure that HGV – derived tractor units, even if used exclusively for STGO work, are no longer exempt. Specialised track laying vehicles, self propelled trailers and multiple axle trailers capable of being operated in various axle configurations will continue to remain exempt.

The changes are likely to be implemented in the UK before 2017 (possibly as early as 2014 following a short consultation process). Individuals will be able to respond to the consultation process once it is released.

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